

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 1:18-cr-83 (TSE)

GOVERNMENT’S MOTION FOR RESTITUTION ORDER

The United States of America, by and through Special Counsel Robert S. Mueller, III, files this motion for a restitution order per the Court’s order on March 7, 2019. *See* Doc. No. 320.

The government has conferred with defense counsel and they have no objection to the language in the attached proposed restitution order. Nevertheless, as defense counsel stated at the sentencing hearing, Mr. Manafort declines to sign the restitution order.

A redacted proposed restitution order is attached to this motion. The government will submit the unredacted proposed order directly to the Clerk’s office so it may be transmitted to chambers.

Respectfully submitted,

Dated: March 12, 2019

Uzo Asonye
Assistant United States Attorney
Eastern District of Virginia

/s/_____
Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Senior Assistant Special Counsels
Special Counsel's Office
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530
Telephone: (202) 616-0800
Attorneys for United States of America

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of March, 2019, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas E. Zehnle (VA Bar No. 27755)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
tezehnle@gmail.com

Jay R. Nanavati (VA Bar No. 44391)
Kostelanetz & Fink LLP
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
jnanavati@kflaw.com

/s/ Uzo Asonye
Assistant United States Attorney
U.S. Attorney's Office
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, VA 22314
uzo.asonye@usdoj.gov
Phone: (703) 299-3700
Fax: (703) 299-3981
Attorney for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:18-cr-83 (TSE)
)	
PAUL J. MANAFORT, JR.,)	
)	
<i>Defendant.</i>)	
_____)	

RESTITUTION ORDER

1. Pursuant to 18 U.S.C § 3663A(a)(1), the defendant is ordered to pay restitution in the amount of **\$24,815,108.74**, and no more than that amount, jointly and severally with any other defendants who are ordered to pay restitution for the same losses.
2. Pursuant to 18 U.S.C § 3583(d), as a condition of supervised release, the defendant is ordered to pay restitution to the Internal Revenue Service in the amount of **\$6,164,032**.
3. The amount of restitution paid to any entity shall not exceed the entity's total loss from the offenses of conviction. Any amount paid to an entity under an order of restitution shall be reduced by an amount later recovered for the same loss by the entity in any Federal or State civil proceeding.
4. The entities' names, addresses, and respective total loss amounts are listed in Attachment A to this Restitution Order.
5. Interest:

 X is waived.

 _____ accrues as provided in 18 U.S.C § 3612(f).
6. Notwithstanding any other provision of this Restitution Order or the sentence imposed, including the directive to make periodic payments, restitution is due in full and payable immediately from assets known and unknown and including assets identified in the Presentence Report. The Government may enforce restitution at any time.
7. If incarcerated, the Court encourages the defendant to participate in the Bureau of Prisons' Inmate Financial Responsibility Program, to comply with the provisions of the

financial plan, and to meet the defendant's financial obligation, pursuant to 28 C.F.R. § 545.10-11.

8. If restitution is not paid in full immediately, the defendant and any other defendants who are ordered to pay restitution for the same losses, shall pay to the Clerk at least \$100 per month or 25 percent of net income, whichever is greater, beginning 60 days after release from any period of confinement, or 60 days after sentencing if no confinement is imposed.
9. All payments shall be made to the Clerk of Court, United States District Court, 401 Courthouse Square, Alexandria, Virginia 22314.
10. Within 30 days of (a) any change of name, residence, or mailing address; and/or (b) any material change in economic circumstances that affects the ability to pay restitution, the defendant shall notify the Clerk of Court and the Special Counsel's Office, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, D.C. 20530.
11. No delinquent or default penalties will be imposed except upon Order of the Court.
12. Pursuant to 18 U.S.C. § 3664(i), the priority of payments to entities shall be:
 - a. All direct entities shall be paid in full first on a *pro rata* basis.
 - b. Internal Revenue Service shall be paid last.

Honorable T.S. Ellis, III
United States District Judge

ENTERED this ____ day of _____, 2019.

at Alexandria, Virginia

WE ASK FOR THIS:

Uzo Asonye
Assistant United States Attorney
Eastern District of Virginia

ROBERT S. MUELLER, III
Special Counsel

/s/

Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Counsel's Office
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530
Telephone: (202) 616-0800

Attorneys for the United States of America

REDACTED ATTACHMENT A TO RESTITUTION ORDER

Entity:	Loss Amount:
Citizens Bank (Lender B)	\$2,577,724.80
Banc of California (Lender C)	\$685,448.55
Federal Savings Bank (Lender D)	\$15,387,903.39
Internal Revenue Service	\$6,164,032
Total due from defendant:	\$24,815,108.74

FILED UNDER SEAL PURSUANT TO THE E-GOVERNMENT ACT OF 2002**SEALED ATTACHMENT A TO RESTITUTION ORDER**

Entity:	Loss Amount:
Citizens Bank (Lender B) [REDACTED]	\$2,577,724.80
Banc of California (Lender C) [REDACTED]	\$685,448.55
Federal Savings Bank (Lender D) [REDACTED]	\$15,387,903.39
IRS-RACS [REDACTED]	\$6,164,032
Total due from defendant:	\$24,815,108.74